

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE	)	
IMPLANT PRODUCTS LIABILITY	)	MDL NO. 2272
LITIGATION	)	
	)	
This Document Relates to All Cases	)	Master Docket Case No. 1:11-cv-05468
	)	
	)	Honorable Rebecca Pallmeyer

*William Colbert, et al. v. Zimmer, Inc., et al.*  
Eastern District of Pennsylvania, Case No. 2:12-cv-01335-JS

**MOTION FOR SUGGESTION OF REMAND: COLBERT**

The defendants respectfully request that this Court suggest the remand of the above-captioned matter to the transferor court. As the Memorandum In Support Of Motion For Suggestion Of Remand: *Colbert* filed simultaneously reveals, *William Colbert, et al. v. Zimmer, Inc., et al.*, does not involve a *NexGen®* Flex Femoral Component or MIS Total Knee Procedure Stemmed Tibial Component Fixed Bearing Precoat. Instead, Mr. Colbert's femoral and tibial components are the "standard" *NexGen®* Legacy Posterior Stabilized Option Femoral Component and *NexGen®* A/P Wedged Stemmed Tibial Component – neither of which are within the scope of the MDL, and neither of which include the flex design features central to the plaintiffs' theory of defect.

As such, *Colbert* should be the subject of a suggestion of remand.

Respectfully submitted,

Dated: August 10, 2012

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State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer,  
Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State  
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Associates, Inc. (incorrectly named as Zimmer Melia  
& Associates, Inc.), Zimmer Orthobiologics, Inc.,  
Zimmer US, Inc., and Zimmer Production, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on August 10, 2012, a copy of the foregoing Motion For Suggestion  
Of Remand: *Colbert* was filed electronically. Parties may access this filing through the Court's  
system.

/s/ Andrea Roberts Pierson